

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
HOCKETT, MARCUS
 207 JEFFREY STREET
 CHESTER, PA 17960

(b) County of Residence of First Listed Plaintiff DELAWARE
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
GARY SCHAFKOPF, ESQUIRE
 11 BALA AVENUE
 BALA CYNWYD, PA 19004

DEFENDANTS
THE GEO GROUP, INC. AND JOHN REILLY, JR.

County of Residence of First Listed Defendant PALM BEACH COUNTY
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)
MATTHEW H. FRY, ESQUIRE
 21 WEST FRONT STREET
 MEDIA, PA 19063

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
 (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
 (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|--|--|--|--|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act | <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) |
| | | | IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | SOCIAL SECURITY <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 |
| | | | | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
SECTION 1983
 Brief description of cause:
CIVIL RIGHTS VIOLATION

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE
06/16/2020SIGNATURE OF ATTORNEY OF RECORD
/s/ Matthew H. Fry, Esquire

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

MARCUS HOCKETT

CIVIL ACTION

v.

**THE GEO GROUP, INC. AND
JOHN REILLY, JR.**

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

June 16, 2020

/s/ Matthew H. Fry

The GEO Group, Inc.

Date

Attorney-at-law

Attorney for

(610) 565-5700

(610) 891-0652

mfry@dioriosereni.com

Telephone

FAX Number

E-Mail Address

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: **Marcus Hockett; 207 Jeffrey St. Chester, PA 17960**

Address of Defendant: **The GEO Group, Inc.; 4955 Technology Way Boca Raton, FL 33431**

Place of Accident, Incident or Transaction: **Delaware County , PA**

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☒ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases
(Please specify) _____

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, _____, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: _____

Attorney-at-Law

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: **June 16, 2020**

/s/ Matthew H. Fry

83131

Attorney-at-Law

Attorney I.D.#

BENARI LAW GROUP

102 E. State Street, Ste. 2A
Media, PA 19063

CITY OF PHILADELPHIA

1515 Arch Street, 17th Floor
Philadelphia, PA 19102

**BLANCHE CARNEY, CITY OF
PHILADELPHIA PRISONS
COMMISSIONER**

In her individual & official capacity
7901 State Road
Philadelphia, PA 19382

**JOHN P. DELANEY, WARDEN
CURANN FROMHOLD
CORRECTIONAL FACILITY**

In his individual & official capacity
7901 State Road
Philadelphia, PA 19382

Defendants

**TO: THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA:**

Defendants, The GEO Group, Inc. and John A. Reilly, Jr. by and through their attorneys, Robert M DiOrio and Matthew H. Fry, give notice of removal of the above-captioned action from the Court of Common Pleas of Philadelphia County, Pennsylvania, in which this action is now pending, to the United States District Court for the Eastern District of Pennsylvania, pursuant to 28 U.S.C. §§1331, 1443, and 1446, and in support thereof aver as follows:

1. Plaintiff commenced this civil action by filing a Writ of Summons on March 26, 2020. A complaint was later filed in the Court of Common Pleas of Philadelphia County, Pennsylvania on May 20, 2020. A true and correct copy of the Plaintiff's Complaint is attached as Exhibit A.

2. Defendants accepted service of the Complaint on June 1, 2020 and Defendants have filed this Notice of Removal with 30 days of service of the Complaint, and thus this removal is timely pursuant to 28 U.S.C. §1441(e) and 28 U.S.C. §1446. A true and correct copy of the docket entries from the action filed in Philadelphia County Court of Common Pleas is attached hereto as Exhibit B.

3. Plaintiff, Marcus Hockett, has raised §1983 federal civil rights claims in his Complaint and thus this Court has original jurisdiction and this case is subject to removal pursuant to 28 U.S.C. §1331 and §1443(2). *See* Exhibit A.

4. The entire record from the State Court is attached, which consists of Exhibit A, Plaintiff's Complaint.

WHEREFORE, Defendant hereby gives notice of removal of the above action now pending in the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania. This action will proceed in this Court as an action properly removed thereto.

DiORIO & SERENI, LLP

DATE: June 16, 2020

BY: /s/ Robert M. DiOrio
ROBERT M. DiORIO, ESQ.
Attorney ID No.: 17838

/s/ Matthew H. Fry
MATTHEW H. FRY, ESQ.
Attorney ID No.: 83131
DiOrio & Sereni LLP
P.O. Box 1789
Media, PA 19063

EXHIBIT “A”

Schafkopf Law, LLC
Gary Schafkopf, Attorney
11 Bala Ave
Bala Cynwyd PA 1900
610-664-5200 Ext 104
Fax: 888-283-1334

Attorney for Plaintiffs

: JURY TRIAL OF TWELVE (12)
: JURORS DEMANDED

Case ID: 200302434

and

BENARI LAW FIRM, PC
102 E. State Street, Ste. 2A
Media, PA 19063

and

BENARI LAW GROUP
102 E. State Street, Ste. 2A
Media, PA 19063

and

CITY OF PHILADELPHIA
1515 Arch Street, 17th Fl.
Philadelphia, PA 19102

and

**BLANCHE CARNEY, CITY OF
PHILADELPHIA PRISONS
COMMISSIONER**
In her individual & official capacity
7901 State Road
Philadelphia, PA 19382

and

**JOHN P. DELANEY, WARDEN
CURANN FROMHOLD
CORRECTIONAL FACILITY**
In his individual & official capacity
7901 State Road,
Philadelphia, PA 19382

and

**JOHN A. REILLY, JR., DIRECTOR
GEORGE W. HILL CORRECTIONAL
FACILITY**
In his individual & official capacity
500 Cheyney Road
Thornton, PA 19373

and

THE GEO GROUP

4955 Technology Way

Boca Raton, FL 33431

Defendants

:
:
:
:**NOTICE TO DEFEND****NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas ex-puestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Philadelphia Bar Association
One Reading Center
11th & Market Streets
Philadelphia, PA 19107
215-238-6333

USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A UN ABOGADO, VA A O TELEFONEA LA OFICINA EXPUSO ABAJO. ESTA OFICINA LO PUEDE PROPORCIONAR CON INFORMACION ACERCA DE EMPLEAR A UN ABOGADO.

SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMACION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUN HONORARIO.

Philadelphia Bar Association
One Reading Center
11th & Market Streets
Philadelphia, PA 19107
215-238-6333

WEISBERG LAW
 Matthew B. Weisberg, Attorney ID No. 85570
 David Berlin, Attorney ID No. 314400
 7 South Morton Ave.
 Morton, PA 19070
 610-690-0801
 Fax: 610-690-0880

Attorney for Plaintiffs

Schafkopf Law, LLC
 Gary Schafkopf, Attorney ID No. 83362
 11 Bala Ave
 Bala Cynwyd PA 1900
 610-664-5200 Ext 104
 Fax: 888-283-1334

Attorney for Plaintiffs

MARCUS HOCKETT
 207 Jeffrey Street
 Chester, PA 17960

Plaintiff

v.

JORDAN REILLY, ESQUIRE
d/b/a JORDAN REILLY AND
ASSOCIATES
 210 W. Front Street, First Floor
 Media, PA 19063

and

JORDAN REILLY AND ASSOCIATES
 210 W. Front Street, First Floor
 Media, PA 19063

and

DEON BROWN, ESQUIRE
d/b/a BROWNING LEGAL GROUP
 25 W. Second Street
 Media, PA 19063

BROWNING LEGAL GROUP
 25 W. Second Street
 Media, PA 19063

and

ARIK BEN-ARI, ESQUIRE
d/b/a BENARI LAW FIRM, PC
d/b/a BENARI LAW GROUP
 102 E. State Street, Ste. 2A
 Media, PA 19063

:
 : **PHILADELPHIA COUNTY COURT**
 : **OF COMMONS PLEAS**

:
 : **No. 200302434**

:
 : **JURY TRIAL OF TWELVE (12)**
 : **JURORS DEMANDED**

and

BENARI LAW FIRM, PC
102 E. State Street, Ste. 2A
Media, PA 19063

and

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CITY OF PHILADELPHIA
1515 Arch Street, 17th Fl.
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and

**BLANCHE CARNEY, CITY OF
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7901 State Road,
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and

**JOHN A. REILLY, JR., DIRECTOR
GEORGE W. HILL CORRECTIONAL
FACILITY**
In his individual & official capacity
500 Cheyney Road
Thornton, PA 19373

and

| | |
|----------------------|---|
| THE GEO GROUP | : |
| 4955 Technology Way | : |
| Boca Raton, FL 33431 | : |
| Defendants | : |

CIVIL ACTION COMPLAINT

I. PARTIES

1. Plaintiff, Marcus Hockett, is an adult individual currently residing at the above captioned address.
2. Defendant, Jordan Reilly, Esquire, is a licensed attorney at the Defendant law firm, Jordan Reilly & Associates both maintaining an office at the above-captioned address. Plaintiff is asserting a professional liability claim against all Defendants. Upon information and belief, jurisdiction is proper in this venue because Defendant is believed to have carried on regular, continuous, and substantial business in Philadelphia County.
3. Defendant, Deon Browning Esquire, is a licensed attorney at the Defendant law firm, Browning Legal Group both maintaining an office at the above-captioned address. Plaintiff is asserting a professional liability claim against all Defendants. Upon information and belief, jurisdiction is proper in this venue because Defendant is believed to have carried on regular, continuous, and substantial business in Philadelphia County.
4. Defendant, Arik Ben-Ari, Esquire, is a licensed attorney at the Defendant law firms, Benari Law Firm, P.C. and Benari Law Group maintaining offices at the above-captioned addresses. Plaintiff is asserting a professional liability claim against all Defendants. Upon information and belief, jurisdiction is proper in this venue because Defendant is believed to have carried on regular, continuous, and substantial business in Philadelphia County.

5. Defendant, City of Philadelphia, is a city in the Commonwealth of Pennsylvania is headquartered at the above-captioned address.
6. Defendant, Blanche Carney, is the Commissioner of the Philadelphia, Department of Prisons, located at the above-captioned address.
7. Defendant, John P. Delaney, is the Warden of the Curann Fromhold Correctional Facility, located at the above-captioned address.
8. Defendant, John A. Reilly, is the Director of the George W. Hill Correctional Facility, located at the above-captioned address.
9. Defendant, GEO Group, is a publicly traded real estate investment trust that invests in private prisons and mental health facilities and is headquartered at the above-captioned address.
10. Venue is proper in this Honorable Court as the events giving rise to this action occurred in Philadelphia County.

II. OPERATIVE FACTS

11. Plaintiff was charged by complaint in Commonwealth v. Marcus Daniels, docket number, CP-51-CR-0004817-201 on April 15, 2015.
12. Plaintiff was arrested as a result of these charges on or about April 18, 2016.
13. On August 20, 2018, all charges against Plaintiff were dismissed Pursuant to Pa.Rule.Crim.P. 600(A)(2)(a).¹

¹ Pursuant to Pa.Rule.Crim.P. 600(A)(2)(a), “Trial in a court case in which a written complaint is filed against the defendant shall commence within 365 days from the date on which the complaint is filed.” The automatic run date under rule 600 was April 14, 2016.

14. Prior to Plaintiff's charges being dismissed, immediately upon his April 2016 arrest, Plaintiff was taken into custody and incarcerated at Curann Fromhold Correctional facility (CFC).

ATTORNEY MALPRACTICE

15. After his arrest, in or around May 2016, Plaintiff hired Jordan Reilly, Esquire to represent him. Plaintiff had previously used Ms. Reilly in a child custody matter. He paid Ms. Reilly \$1,000.00 to represent him in the preliminary hearing.
16. Shortly after the preliminary hearing, Ms. Reilly withdrew as Plaintiff's counsel. Ms. Reilly who primarily practices family law, advised Plaintiff that he would be better off with a criminal lawyer. If Plaintiff knew that Ms. Reilly was not equipped to handle his case. He would not have retained her in the first place.
17. On May 23, 2016 Plaintiff released on bail. However, as Plaintiff was already on Parole in Delaware County², his April arrest constituted a parole violation. Due to this alleged parole violation, Plaintiff was then incarcerated at the George W. Hill Correctional Facility in Thornton, PA.
18. In May 2016, Plaintiff hired Deon Browning, Esquire to represent him. Plaintiff paid Mr. Browning approximately \$2,000.00. In or around 2017, Plaintiff terminated Mr. Browning's services as he felt as though Mr. Browning was not being aggressive enough.
19. In or around December 2016, Plaintiff hired Arik Ben-Ari, Esquire as his counsel. Plaintiff payed Mr. Ben-Ari approximately \$7,000.00 to represent him.

² On February 6, 2012, Plaintiff was sentenced in Delaware County Court of Common Pleas on docket CP-23-CR-0005503-2011 to an aggregate sentence of 18-36 months with a consecutive three years of special state supervised probation and parole.

20. On or about December 21, 2016, Plaintiff was released from George W. Hill Correctional Facility on an ankle monitor for 13 months.
21. Defendant Ben-Ari terminated his representation of Plaintiff in or around January 2018. Mr. Ben-Ari advised Plaintiff that the reason he was terminating his services was because he felt that Plaintiff would not get a fair trial in Philadelphia.
22. Defendant Ben-Ari referred Plaintiff to Marni Jo Snyder, Esquire in or around April 2018 who then took on the representation of Plaintiff. Plaintiff paid Snyder approximately \$6,200.00 for his representation.
23. In or around August 2018, Plaintiff learned about the Rule 600 issue from another attorney.
24. Plaintiff brought the Rule 600 issue to the attention of Snyder who at the time did not seem to understand its relevancy. It was not until Plaintiff then broke down the dates to Snyder and she finally realized the Rule 600 issue.
25. Due to Plaintiff's prompting, Snyder filed a Motion to Dismiss Plaintiff's charges pursuant to Rule 600. Plaintiff's motion was granted and all charges against Plaintiff were dismissed on August 20, 2018.
26. Prior to this, not one of Plaintiff's attorneys, Defendant Reilly, Defendant Browning, Defendant Ben-Ari nor Snyder realized Rule 600 was an issue.
27. Defendant Reilly, Defendant Browning, Defendant Ben-Ari and Snyder should have known how Rule 600 pertained to Plaintiff's case.

MALICIOUS PROSECUTION

28. Defendant City of Philadelphia, Defendant Blanche Carney, Defendant John Delaney, Defendant John Reilly and Defendant GEO Group, failed to exercise due diligence in arresting and/or incarcerating Plaintiff.
29. Plaintiff was reporting regularly to the Commonwealth of Pennsylvania Department of Probation and Parole. If there were criminal charges against plaintiff and/or a warrant out for Plaintiff's arrest, Defendants knew or should have known about it.
30. Plaintiff was overincarcerated for almost 8 months.
31. Plaintiff's career and livelihood has been impacted.
32. Plaintiff was forced to pay for attorney fees and costs to defend his case.
33. As a result, Plaintiff has suffered overincarceration, significant financial damages and severe emotional distress.

III. CAUSES OF ACTION

COUNT I
PROFESSIONAL NEGLIGENCE/MALPRACTICE AND SIMPLE NEGLIGENCE
(Plaintiff v. Defendants Reilly, Browning, and Ben-Ari including their Defendant law firms)

34. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.
35. At all times material, Defendants breached their duty of care to Plaintiff, acting negligently, recklessly, and carelessly, and in the following regards, respectively:
 - a. Failing to provide appropriate and necessary legal advice and services;
 - b. Failing to advise Plaintiff of Rule 600
 - c. Other conduct that deviated from the applicable standard of care.

36. As set forth above and at all times material, Defendants failed to possess and/or exercise the ordinary skill, knowledge and care normally possessed and exercised by members of good standing in the legal profession.

37. As a direct and proximate result of Defendants' negligence, carelessness and recklessness, Plaintiff suffered actual loss.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000.00), including punitive damages, and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT II

BREACH OF CONTRACT/ COVENANT OF GOOD FAITH AND FAIR DEALING (Plaintiff v. Defendants Reilly, Browning, and Ben-Ari including their Defendant law firms)

38. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

39. Defendants' aforementioned conduct constitutes a breach of the fee and other agreements, and the covenant of good faith and fair dealing, express, implied, and as a matter of law.

40. As a direct and proximate result of the aforesaid breach of the agreement, Plaintiff has been damaged as set forth above.

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000.00), including punitive damages, and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT III
BREACH OF FIDUCIARY DUTY

(Plaintiff v. Defendants Reilly, Browning, and Ben-Ari including their Defendant law firms)

41. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

42. Plaintiff and Defendants were in a fiduciary relationship.

43. Defendants' aforementioned conduct constitutes a breach of that fiduciary relationship.

44. As a direct and proximate result of the aforesaid breach of fiduciary duty, Plaintiff has been damaged (as set forth above).

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifteen thousand dollars (\$50,000.00), including punitive damages, and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT IV
MALICIOUS PROSECUTION/ FALSE ARREST/ WRONGFUL IMPRISONMENT
(Plaintiff v. Defendant City of Philadelphia, Defendant Blanche Carney, Defendant John Delaney, Defendant John Reilly and Defendant GEO Group)

45. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

46. At the time of Plaintiff's arrest, he had not committed any infraction to legally justify the arrest and/or charges.

47. Defendants' actions stated above, inter alia, were committed under color of state law and were violations of Plaintiff's clearly established and well-settled Constitutional and other legal rights.

48. Defendants caused Plaintiff to suffer a malicious prosecution by their wrongful conduct in subjecting Plaintiffs to outdated criminal charges, all in violation of the Fourth and Fourteenth Amendments to the United States Constitution.

49. Defendants instituted criminal action against Plaintiff by way of failing to properly investigate the conduct and/or circumstances giving rise his arrest.

50. Defendants did not have probable nor any cause to arrest, charge, and/or accuse Plaintiffs of the criminal acts.

51. The criminal action terminated in Plaintiffs' favor – Plaintiffs' charges were either dismissed or found not guilty.

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifteen thousand dollars (\$50,000.00), including punitive damages, and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT V
MONELL

(Plaintiff v. Defendant City of Philadelphia, Defendant Blanche Carney, Defendant John Delaney, Defendant John Reilly and Defendant GEO Group)

52. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

53. At the time of Defendants' arrest, charges, and imprisonment, Plaintiff had not committed any infraction to legally justify the incarceration and charges.

54. Defendants' actions stated above, *inter alia*, were committed under color of state law and were violations of Plaintiff's clearly established and well-settled Constitutional and other legal rights.

55. Defendants instituted criminal action against Plaintiff.
56. Plaintiff was seized from the time he was arrested through the time he was imprisoned.
57. Defendants did not have probable nor any cause to arrest, charge, and/or accuse Plaintiff of the criminal acts.
58. Defendant's violations against Plaintiff were done in accord with their policies, customs, and procedures.
59. The constitutional violations committed against Plaintiff were due to Defendant's failure to adequately train and/or supervise.
60. As a result of Defendants' policies, customs, procedures which allowed for the violations of Plaintiff's constitutional rights, Defendants' were in violation of 42 U.S.C. §1983, by way of Monell v. Department of Social Services, 436 U.S. 658 (1978).

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifteen thousand dollars (\$50,000.00), including punitive damages, and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

JURY DEMAND

Plaintiffs hereby demand a jury trial as to all issues so triable herein.

[remainder of page left intentionally blank]

Respectfully submitted,

/s/ David A. Berlin
David A. Berlin, Esquire
PA Attorney ID. No. 314400
Matthew B. Weisberg, Esquire
PA Attorney Id. No. 85570
7 South Morton Ave.
Morton, PA 19070

(610) 690-0801
(610) 690-0880 – Fax

/s/ Gary Schafkopf

Gary Schafkopf, Esquire
SCHAFKOPF LAW
PA Attorney Id. No. 83362
11 Bala Ave.
Bala Cynwyd, PA 19044
(610) 664-5200 (ext. 104)
(888) 283-1334 – Fax

DATED: 5-20-2020

VERIFICATION

I, David Berlin Esquire, hereby verifies that I am counsel for plaintiff, Marcus Hockett, and herein states that the statements in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. I am making this verification on behalf of plaintiff, Marcus Hockett, I acknowledge that the foregoing Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

/s/ David Berlin
David Berlin, Esq

Dated: 5-20-2020

WEISBERG LAW
Matthew B. Weisberg, Attorney ID No.: 85570
7 South Morton Ave.
Morton, PA 19070
610-690-0801
Fax: 610-690-0880
Attorney for Plaintiff

SCHAFKOPF LAW, LLC
Gary Schafkopf, Attorney ID No. 83362
11 Bala Ave
Bala Cynwyd, PA 19004
610-664-5200 Ext 104
Fax: 888-283-1334
Attorney for Plaintiff

MARCUS HOCKETT

Plaintiff,
v.

JORDAN REILY, et al

Defendants

:
:
: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
: PENNSYLVANIA
:
:
: No. 200302434
:
: JURY TRIAL OF TWELVE (12)
: JURORS DEMANDED

CERTIFICATE OF SERVICE

I, Gary Schafkopf, hereby certify that on May 20, 2020, a true and correct copy of the Plaintiff's Complaint was served upon the following by regular and certified mail:

JORDAN REILLY, ESQUIRE
d/b/a JORDAN REILLY AND
ASSOCIATES
210 W. Front Street, First Floor
Media, PA 19063

and

DEON BROWNING, ESQUIRE
d/b/a BROWNING LEGAL GROUP
25 W. Second Street
Media, PA 19063

and

ARIK BEN-ARI, ESQUIRE
d/b/a BENARI LAW FIRM, PC
d/b/a BENARI LAW GROUP
102 E. State Street, Ste. 2A
Media, PA 19063

and

CITY OF PHILADELPHIA

1515 Arch Street, 17th Fl.
Philadelphia, PA 19102

and

BLANCHE CARNEY

1515 Arch Street, 17th Fl.
Philadelphia, PA 19102

and

JOHN P. DELANEY,

1515 Arch Street, 17th Fl.
Philadelphia, PA 19102

and

JOHN A. REILLY, JR.

Philadelphia, PA 19102

and

THE GEO GROUP

4955 Technology Way
Boca Raton, FL 33431

SCHAFKOPF LAW, LLC

DATED:5-20-2020

/s/ Gary Schafkopf

BY: GARY SCHAFKOPF, ESQ.

EXHIBIT “B”

Docket Report

Case Description

Case ID: 200302434
Case Caption: HOCKETT VS REILLY ETAL
Filing Date: Thursday , March 26th, 2020
Location: CH - City Hall
Case Type: Z2 - MISC SUMMONS
Status: CLWCM - WAITING TO LIST CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case Motions

No case motions were found.

Case Parties

| Seq # | Assoc | Expn Date | Type | ID | Name |
|----------|---|-----------|------------------------|-----------|-----------------|
| 1 | | | ATTORNEY FOR PLAINTIFF | A83362 | SCHAFKOPF, GARY |
| Address: | SCHAFKOPF LAW LLC 11 BALA AVENUE BALA CYNWYD PA 19004 (610)664-5200 (888)283-1334 - FAX | | Aliases: | none | |
| | | | | | |
| 2 | 1 | | PLAINTIFF | @10913605 | HOCKETT, MARCUS |
| Address: | 207 JEFFERY STREET CHESTER PA 17960 | | Aliases: | none | |
| | | | | | |
| | | | | | |

| | | | | | |
|-----------------|---|-----------------|------------------------------|-----------|---------------------------------|
| 3 | | | DEFENDANT | @10913606 | CARNEY, BLANCHE |
| Address: | 7901 STATE RD PHILADELPHIA PA 19382 | Aliases: | none | | |
| 4 | | | DEFENDANT | @10913607 | DELANEY, JOHN P |
| Address: | 7901 STATE RD PHILADELPHIA PA 19382 | Aliases: | none | | |
| 5 | | | DEFENDANT | @10913608 | REILLY JR, J' A |
| Address: | 500 CHEYNEY RD THORNTON PA 19373 | Aliases: | none | | |
| 6 | 17 | | DEFENDANT | @10913609 | GEO GROUP |
| Address: | 4955 TECHNOLOGY WAY BOCA RATON FL 33431 | Aliases: | none | | |
| 7 | | | DEFENDANT | @10913610 | REILLY, JORDAN |
| Address: | 210 W. FRONT STREET 1ST FLOOR MEDIA PA 19063 | Aliases: | JORDAN REILLY AND ASSOCIATES | | |
| 8 | | | DEFENDANT | @10913611 | JORDAN REILLY AND ASSOCIATES |
| Address: | 210 W FRONT STREET 1ST FLOOR MEDIA PA 19063 | Aliases: | none | | |
| 9 | | | DEFENDANT | @10913612 | BROWN, DEON |
| Address: | 25 W. SECOND STREET MEDIA PA 19063 | Aliases: | BROWNING LEGAL GROUP | | |

| | | | | | |
|-----------------|--|-----------------|--|-----------|----------------------|
| 10 | | | DEFENDANT | @10913613 | BROWNING LEGAL GROUP |
| Address: | 25 W. SECOND STREET MEDIA PA 19063 | Aliases: | none | | |
| 11 | | | DEFENDANT | @10913614 | BEN-ARI, ARIK |
| Address: | 102 E. STATE STREET 2A MEDIA PA 19063 | Aliases: | BENARI LAW FIRM PC BENARI LAW GROUP | | |
| 12 | | | DEFENDANT | @10913615 | BENARI LAW FIRM PC |
| Address: | 102 E. STATE STREET 2A MEDIA PA 19063 | Aliases: | none | | |
| 13 | | | DEFENDANT | @10913616 | BENARI LAW GROUP |
| Address: | 102 E. STATE STREET 2A MEDIA PA 19063 | Aliases: | none | | |
| 14 | | | DEFENDANT | @10913617 | CITY OF PHILADELPHIA |
| Address: | 1515 ARCH STREET 17TH FLOOR PHILADELPHIA PA 19102 | Aliases: | none | | |
| 15 | 1 | | ATTORNEY FOR PLAINTIFF | A85570 | WEISBERG, MATTHEW B |
| Address: | WEISBERG LAW, PC 7 S MORTON AVE MORTON PA 19070 (610)690-0801 | Aliases: | none | | |

| | | | | | |
|-----------------|---|-----------------|---------------------------|--------|------------------|
| | (610)690-0880 - FAX | | | | |
| 16 | | | TEAM LEADER | J357 | NEW, ARNOLD L |
| Address: | 606 CITY HALL PHILADELPHIA PA 19107 (215)686-7260 | Aliases: | none | | |
| 17 | | | ATTORNEY FOR DEFENDANT | A83131 | FRY, MATTHEW H |
| Address: | DIORIO & SERENI, LLP 21 W. FRONT STREET MEDIA PA 19063 (610)565-5700 (610)891-0652 - FAX | Aliases: | none | | |
| 18 | 17 | | ATTORNEY FOR DEFENDANT | A17838 | DIORIO, ROBERT M |
| Address: | FRONT & PLUM STS PO BOX 1789 MEDIA PA 19063 (610)565-5700 (610)891-0652 - FAX | Aliases: | none | | |

Docket Entries

| | | | | |
|---|-----------------------------|---------------------|-------------------------------|---------------------------------|
| <input type="checkbox"/> Check for Threaded Docket This feature will reduce the docket to motion related entries only. | | | | |
| Filing Date/Time | Docket Type | Filing Party | Disposition Amount | Approval/ Entry Date |
| 26-MAR-2020 02:48 PM | ACTIV - ACTIVE CASE | | | 27-MAR-2020 11:22 AM |
| Docket Entry: | E-Filing Number: 2003045087 | | | |

| | | | | |
|-------------------------|--|------------------------|--|-------------------------|
| 26-MAR-2020 02:48 PM | CIVJ - COMMENCEMENT CIVIL ACTION JURY | SCHAFKOPF, GARY | | 27-MAR-2020 11:22 AM |
| Documents: | Final Cover | | | |
| Docket Entry: | none. | | | |
| | | | | |
| 26-MAR-2020 02:48 PM | WRSUM - PRAE TO ISSUE WRIT OF SUMMONS | SCHAFKOPF, GARY | | 27-MAR-2020 11:22 AM |
| Documents: | Praecipe Writ of Summons - Hockett v Reilly et al.pdf Writ of Summons- Hockett v Reilly et al.pdf Additional Defendants - Writ of Summons.pdf | | | |
| Docket Entry: | PRAECIPE TO ISSUE WRIT OF SUMMONS FILED. WRIT OF SUMMONS ISSUED. | | | |
| | | | | |
| 26-MAR-2020 02:48 PM | JURYT - JURY TRIAL PERFECTED | SCHAFKOPF, GARY | | 27-MAR-2020 11:22 AM |
| Docket Entry: | 12 JURORS REQUESTED. | | | |
| | | | | |
| 26-MAR-2020 02:48 PM | CLWCM - WAITING TO LIST CASE MGMT CONF | SCHAFKOPF, GARY | | 27-MAR-2020 11:22 AM |
| Docket Entry: | none. | | | |
| | | | | |
| 27-MAR-2020 04:35 PM | ENAPC - ENTRY OF APPEARANCE-CO COUNSEL | WEISBERG, MATTHEW B | | 28-MAR-2020 09:28 PM |
| Documents: | Entry of Appearance.pdf | | | |
| Docket Entry: | ENTRY OF APPEARANCE OF MATTHEW B WEISBERG AS CO-COUNSEL FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| | | | | |
| 15-APR-2020 10:48 AM | WRSUR - PRAECIPE TO REISSUE SUMMONS | SCHAFKOPF, GARY | | 15-APR-2020 10:53 AM |
| Documents: | Praecipe to Reissue Writ of Summons - Hockett.pdf Civil Cover Sheet - Hockett.pdf Additional Defs - Hockett.pdf Writ of Summons - Hockett.pdf | | | |
| Docket Entry: | PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |

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|--------------------------|--|--------------------|--|-------------------------|
| 30-APR-2020 02:42 PM | ACCOS - ACCEPTANCE OF SERVICE FILED | SCHAFKOPF, GARY | | 30-APR-2020 06:01 PM |
| Documents: | Affidavit of Service - City of Philadelphia Defendants.pdf | | | |
| Docket Entry: | SERVICE OF PLAINTIFF'S WRIT OF SUMMONS ACCEPTED BY JOHN P DELANEY, J' A REILLY, CITY OF PHILADELPHIA AND BLANCHE CARNEY ON 04/28/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 05-MAY-2020 12:01 PM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 05-MAY-2020 12:03 PM |
| Documents: | Affidavit of Service - The Geo Group.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S WRIT OF SUMMONS UPON GEO GROUP BY CERTIFIED MAIL ON 04/28/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 05-MAY-2020 12:05 PM | WRSUR - PRAECIPE TO REISSUE SUMMONS | SCHAFKOPF, GARY | | 05-MAY-2020 12:06 PM |
| Documents: | Praecipe to Reissue Writ of Summons.pdf TS Writ of Summons dated 04-15-2020.pdf TS Additional Defs dated 05-15-2020.pdf | | | |
| Docket Entry: | PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 20-MAY-2020 11:42 AM | CMPLT - COMPLAINT FILED NOTICE GIVEN | SCHAFKOPF, GARY | | 20-MAY-2020 12:48 PM |
| Documents: | Complaint - Hockett v. Reilly, et al. 5-20-2020.pdf | | | |
| Docket Entry: | COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 20-MAY-2020 11:42 AM | JURYS - JURY TRIAL PERFECTED | SCHAFKOPF, GARY | | 20-MAY-2020 12:48 PM |
| Docket Entry: | 12 JURORS REQUESTED. | | | |
| 22-MAY-2020 11:07 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 22-MAY-2020 05:06 PM |
| Documents: | Affidavit of Service - Bernari Law Firm PC.pdf | | | |

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|-------------------------|--|-----------------|--|-------------------------|
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON BENARI LAW FIRM PC BY CERTIFIED MAIL ON 05/14/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 22-MAY-2020 11:08 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 22-MAY-2020 05:07 PM |
| Documents: | Affidavit of Service - Bernari Law Group.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON BENARI LAW GROUP BY CERTIFIED MAIL ON 05/14/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 22-MAY-2020 02:06 PM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 22-MAY-2020 05:07 PM |
| Documents: | Affidavit of Service - Jordan Reilly Esq.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S WRIT OF SUMMONS UPON JORDAN REILLY BY ON 05/20/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 22-MAY-2020 02:07 PM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 22-MAY-2020 05:07 PM |
| Documents: | Affidavit of Service - Jordan Reilly and Associates.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S WRIT OF SUMMONS UPON JORDAN REILLY AND ASSOCIATES BY CERTIFIED MAIL ON 05/20/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| 02-JUN-2020 10:04 AM | ENAPP - ENTRY OF APPEARANCE | FRY, MATTHEW H | | 02-JUN-2020 01:42 PM |
| Documents: | EOA 6.2.20.pdf | | | |
| Docket Entry: | ENTRY OF APPEARANCE OF MATTHEW H FRY AND ROBERT M DIORIO FILED. (FILED ON BEHALF OF GEO GROUP AND J' A REILLY) | | | |
| 13-JUN-2020 11:22 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 15-JUN-2020 09:13 AM |
| Documents: | Affidavit of Service - The Geo Group.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON GEO GROUP BY CERTIFIED MAIL ON 06/01/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |

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|--------------------------|--|--------------------|--|-------------------------|
| 13-JUN-2020 11:27 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 15-JUN-2020 09:13 AM |
| Documents: | Affidavit of Service - Jordan Reilly.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON JORDAN REILLY BY CERTIFIED MAIL ON 06/01/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| | | | | |
| 13-JUN-2020 11:29 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 15-JUN-2020 09:13 AM |
| Documents: | Affidavit of Service - Arik Ben-Ari.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON ARIK BEN-ARI BY CERTIFIED MAIL ON 06/01/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| | | | | |
| 13-JUN-2020 11:32 AM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 15-JUN-2020 09:14 AM |
| Documents: | Affidavit of Service - Deon Browning.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON DEON BROWN BY CERTIFIED MAIL ON 05/19/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |
| | | | | |
| 13-JUN-2020 01:41 PM | AFDVT - AFFIDAVIT OF SERVICE FILED | SCHAFKOPF, GARY | | 15-JUN-2020 09:14 AM |
| Documents: | Affidavit of Service - Browning Legal Group.pdf | | | |
| Docket Entry: | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON BROWNING LEGAL GROUP BY CERTIFIED MAIL ON 05/19/2020 FILED. (FILED ON BEHALF OF MARCUS HOCKETT) | | | |

BENARI LAW GROUP

102 E. State Street, Ste. 2A
Media, PA 19063

CITY OF PHILADELPHIA

1515 Arch Street, 17th Floor
Philadelphia, PA 19102

**BLANCHE CARNEY, CITY OF
PHILADELPHIA PRISONS
COMMISSIONER**

In her individual & official capacity
7901 State Road
Philadelphia, PA 19382

**JOHN P. DELANEY, WARDEN
CURANN FROMHOLD
CORRECTIONAL FACILITY**

In his individual & official capacity
7901 State Road
Philadelphia, PA 19382

Defendants

CERTIFICATE OF SERVICE

We, Robert M. DiOrio and Matthew H. Fry, attorneys for Defendants, hereby certify that a true and correct copy of the foregoing Notice of Removal was filed electronically via the Court's Electronic system on the date below and is available for viewing and download by all counsel of record.

Respectfully submitted:
DiORIO & SERENI, LLP

Date: June 16, 2020

BY: /s/Robert M. DiOrio
ROBERT M. DIORIO, ESQ.
Attorney ID No. 17838

/s/ Matthew H. Fry
MATTHEW H. FRY, ESQ.
Attorney ID No. 83131
21 West Front Street
P.O. Box 1789
Media, PA 19063
(610) 565-5700 (telephone)
(610) 891-0652 (facsimile)